

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Objection Deadline

January 14, 2025, at 4:00 p.m. (ET)

Hearing Date

January 21, 2025, at 1:00 p.m. (ET)

**NOTICE OF MOTION OF HIGHLAND AND STERLING, LLC AND BIG HOLDINGS
2, LLC TO (A) COMPEL IMMEDIATE REJECTION OF LEASE AND SURRENDER
POSSESSION OF THE PREMISES PURSUANT TO 11 U.S.C. § 365 OR,
ALTERNATIVELY, (B) GRANT LANDLORD RELIEF FROM STAY PURSUANT
TO 11 U.S.C. § 362(d); AND (C) FOR RELATED RELIEF**

PLEASE TAKE NOTICE that, on January 7, 2025, Highland and Sterling, LLC and Big Holdings 2, LLC (collectively, “Landlord”), filed the *Motion of Highland and Sterling, LLC and Big Holdings 2, LLC to (A) Compel Immediate Rejection of Lease and Surrender Possession of the Premises Pursuant to 11 U.S.C. § 365 or, Alternatively, (B) Grant Landlord Relief From Stay Pursuant to 11 U.S.C. § 362(d), and (C) For Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the relief requested in the Motion must be (a) in writing; (b) filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, on or before **January 14, 2025, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”); and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel to the Landlord.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief sought in the Motion will be held on **January 21, 2025, at 1:00 p.m. (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard, before the Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #6, Wilmington, DE 19801.

Dated: January 7, 2025
Wilmington, Delaware

/s/ Leslie C. Heilman

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